



From: Ned Sackman

Sent: Tuesday, January 14, 2025 5:28 PM

To: shawn@binnall.com

Cc: Jacob Rhodes <Rhodesj@cwbp.com>; jason@binnall.com; Shawnay <shawnay@binnall.com>; Jared Roberts <jared@binnall.com>; Tyler Mills <tmills@melicklaw.com>; Christian H. Hinrichsen <chinrichsen@melicklaw.com>; Richard C. Gagliuso <rgagliuso@bernsteinshur.com>; Lucas Fortier <lfortier@bernsteinshur.com>

Subject: Hearing Follow Up

Shawn,

I write to follow up on the motions hearing today. We will now have 90 days to complete discovery. I suggest moving forward as follows:

1. Please provide answers to our second set of interrogatories. Your objections based on discovery closing are no longer valid. You originally proposed responding 21 days after an extension was granted. How about responding within 14 days of today?
2. We are willing to narrow our request for communications directly concerning President Trump, his family members, advisors, White House staff, or staff with Donald J. Trump for President, Inc.” to those communications relating to whether President Trump won the 2020 election. I believe that we already limited the time frame, but if we did not, I propose October 1, 2020 through January 31, 2021.
3. Please advise of your position on the materials provided to the January 6 Committee. It is my hope that in view of the Court’s comments you will reconsider your objection to providing that material.
4. Please respond to the other items in my December 9, 2024 letter:

- a. Please provide complete information for the new witnesses and other supplemental material you disclosed in November 2024, including names and addresses, and the specific amount of damages plus how it was calculated.
 - b. Please clarify whether 1AP or Mr. Luelsdorff intend to produce documents.
 - c. Please provide a privilege log.
5. Please provide deposition dates for Mr. Lewis, Mr. Luelsdorff, and a 30b6 for 1AP. We will endeavor to make Mr. Abramson available the day immediately after the depositions of the plaintiffs are completed. Please advise if you want to depose anyone else.
6. We will circulate a draft with the dates that the Court identified on the call today for your review.

Thank you.

Ned